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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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THOMAS V. SKINNER, DIRECTOR

217/524-1655

May 4, 2000

Ms. Wendy L. Carney
United States Environmental Protection Agency
Region 5
Superfund Division, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: 2010300018 - Winnebago County
Interstate Pollution Control
Superfund/Technical Reports

Dear Ms. Carney:

This letter is in response to your January 13, 2000 letter regarding the Superfund Record of Decision (ROD) for the Interstate Pollution Control Superfund Site in Rockford, Illinois. The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the three alternatives outlined in the January 13, 2000 letter and from this review, has formulated an alternative approach for consideration by the United States Environmental Protection Agency (USEPA). I apologize for the delay in our response.

COMMENTS ON THE THREE PROPOSED ALTERNATIVES**OPTION 1 - REVISE THE ROD TO INCLUDE ALL ELEMENTS REQUIRED BY USEPA'S
MONITORED NATURAL ATTENUATION GUIDANCE:**

This option would require significant field work through a revisitation of the Remedial Investigation ("RI") with the associated revisions to the RI Work Plan, Quality Assurance Project Plan, among others. We must keep in mind that the Monitored Natural Attenuation ("MNA") remedy guidance has substantially matured since the RI Work Plan was approved for this site. These changes to the MNA remedy guidance likewise were implemented following selection of the remedy for the adjacent Southeast Rockford

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("SER") Superfund Site and this revisitation of IPC carries a risk of calling to question many decisions being implemented at the SER Superfund site. It is this level of risk that causes the Illinois EPA to not implement this option.

OPTION 2 - REVISE THE ROD TO CONSIDER AN "INSTITUTIONAL CONTROLS / MONITOR ONLY" ALTERNATIVE FOR GROUNDWATER INSTEAD OF RELYING ON A MNA
JUSTIFICATION:

The remedy proposed in the current ROD contains a more extensive groundwater remedy than described by the "Institutional Controls / Monitor Only" option description. Further discussion of a variant Illinois EPA proposal is presented in a later section of this letter.

OPTION 3 - EXPAND THE AREA ADDRESSED BY THE SOUTHEAST ROCKFORD GROUNDWATER DECISION TO INCLUDE A BROADER GEOGRAPHICAL AREA (BASED ON A CONTOUR LESS THAN THE CURRENT 10 PPB TOTAL VOCs):

This is a minor, but substantive variant of a concept initially proposed by the Illinois EPA. To lower the 10 parts per billion (ppb) total VOCs definition of the SER site boundary would have substantial impacts on areas of the SER site beyond incorporation of the IPC site within the SER site. The implementation of this option would also necessitate an amendment of the SER ROD with all of the associated programmatic demands. Resource limitations eliminate this option from consideration.

Illinois EPA's original concept was to incorporate groundwater monitoring data from the IPC RI along with data from groundwater data from the Mattison Machine RCRA site into the data defining the boundary of the SER site and redefine the SER site based on the same 10 ppb total VOCs contour interval. This concept would not require revision of the SER ROD but simply a change of the SER site boundary based on new information. The Illinois EPA has further considered this option and finds it to be inconsistent with a Consent Order between the City of Rockford, Illinois EPA, and U.S. EPA (the IPC site is specifically excluded from that Consent Order). Additionally significant public and municipal trust issues would be jeopardize by this concept.

PROPOSED ALTERNATIVE

OPTION 4 - VARIATION OF OPTION 2, "IMPERMEABLE BARRIER, GROUNDWATER MONITORING, INSTITUTIONAL CONTROLS WITH CONTINGENT SOIL VAPOR EXTRACTION":

This variation of Option 2, "Institutional Controls/Monitor Only" incorporates the Impermeable Barrier component of the current ROD, continues the Institutional Control component of both the existing ROD and the proposed Option 2, "Institutional

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Controls/Monitor Only" and further incorporates the Contingent Soil Vapor Extraction component of the existing ROD. The Impermeable Barrier component of the existing ROD is an integral segment of the groundwater remedy in that risk of continued contaminant release to groundwater is substantially reduced by restricting infiltration of precipitation while the anecdotally verified biodegradation of soil VOCs continues. Additionally, this variation of Option 2 acknowledges the Contingent Soil Vapor Extraction component as an integral segment of the overall groundwater remedy if the Impermeable Barrier and biodegradation prove insufficient to protect the groundwater resource.

NEXT STEPS

Please review and evaluate the proposed alternative against the needs of USEPA for incorporation into and concurrence with the existing Record of Decision for the IPC Superfund Site. If you should have any questions or require any additional information regarding this matter, or wish to discuss this matter further, please feel free to contact me at 217/524-1655 or Terry G. Ayers, P.E. of my staff at 217/782-9875. Thank you for your time and consideration regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence L. Smith", with a stylized flourish at the end.

Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land